

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

MOBILOC, LLC,

Plaintiff,

v.

NEUTRON HOLDINGS, INC. DBA LIME,

Defendant.

NO. 2:20-cv-01570-BJR

**PLAINTIFF'S AGREED MOTION
FOR EXTENSION OF DEADLINE
TO FILE RESPONSE TO
DEFENDANT'S MOTION FOR
ATTORNEY FEES (DOC. 63)**

Pursuant to LCR 7(d)(1), LCR 7(j), and § II.D of the Court's Standing Order for All Civil Cases ("Standing Order"), Plaintiff Mobiloc, LLC respectfully requests that the Court extend the deadline for Plaintiff to file its response to Defendant's Motion for Attorney Fees Under 35 U.S.C. § 285 and Fed. R. Civ. P. 54(d) (Doc. 63) ("Motion for Fees") by two weeks. Under § II(A) of the Standing Order, Plaintiff's response is currently due on November 30, 2021. Plaintiff requests that this deadline be extended to December 14, 2021.

Plaintiff has conferred with Defendant regarding this matter. Defendant does not oppose this motion, and agrees that the motion may be granted.

Good cause exists for the Court to grant Plaintiff a two-week extension of the deadline to respond to Defendant's Motion for Fees. Plaintiff recently retained new counsel (Zuber Lawler LLP and Savitt Bruce & Willey LLP) to represent it in this matter. Plaintiff's new

1 attorneys need time to familiarize themselves with the facts and procedural history of this case,
2 review and analyze Defendant's Motion for Fees and the materials Defendant filed in support
3 of its fee request, and prepare an informed and thorough response to the Motion for Fees.
4 Plaintiff does not seek the requested extension in an effort to delay this proceeding, but rather
5 to give Plaintiff and its new counsel adequate time to respond to the Motion for Fees so that
6 justice may be served.

7 For the foregoing reasons, Plaintiff respectfully requests that the Court extend from
8 November 30, 2021 to December 14, 2021 the deadline for Plaintiff to file a response to the
9 Motion for Fees.

10 DATED: November 24, 2021.

11 **SAVITT BRUCE & WILLEY LLP**

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13 By: /s/ Duncan E. Manville
14 Duncan E. Manville, WSBA No. 30304
15 1425 Fourth Avenue, Suite 800
16 Seattle, Washington 98101-2272
Telephone: 206.749.0500
Facsimile: 206.749.0600
Email: dmanville@sbwllp.com

17 **ZUBER LAWLER LLP**

18 Joshua M. Masur (admitted *pro hac vice*)
19 2000 Broadway Street, Suite 154
20 Redwood City, California 94063
Telephone: 213.596.5620
Email: jmasur@zuberlawler.com

21 **ZUBER LAWLER LLP**

22 Jennifer C. Kuhn (pending admission *pro hac vice*)
23 100 Congress Avenue, Suite 2000
24 Austin, Texas 78701
Telephone: 512.717.7430
Email: jkuhn@zuberlawler.com

25 Attorneys for Plaintiff Mobiloc, LLC
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ORDER

IT IS SO ORDERED.

DATED: November 24, 2021.

s/Barbara J. Rothstein
The Honorable Barbara J. Rothstein
United States District Judge

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on November 24, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED this 24th day of November, 2021 at Seattle, Washington.



Nate Garberich